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MEMORANDUM FOR: John D. Evans, Assistant Chief Program Support Branch, NMSS

FROM: Ralph M. Wilde, Program Assistant Division of Fuel Cycle and Material Safety

SUBJECT: PROPOSED LICENSE FEE REVISION - CASEWORK REVIEW EFFORT

In an attempt to provide a broader statistical base from the review effort in various license fee categories, we have recalculated average staff hours required from pooled data for FY80 and FY81. The data for case completions by program code were obtained from end-of-year computer runs from FY80 and FY81. These groupings by program code were then assigned appropriate PPSAS codes. Staff review hours were taken directly from the end-of-year PPSAS runs and grouped by the PPSAS codes corresponding to the case completion codes. Staff time includes both regular and overtime hours. Matching data pair sets consisting of case completions and associated staff hou's for each fiscal year were then assigned to the appropriate fee category. Note: Glenda Jackson, LFMB, provided the listing of the PPSAS codes that are included in each fee category. The cases and the staff review hours were then pooled for each fee category and the average staff review time calculated. No adjustments were made to the raw computer data for case completions and review hours. In those instances where the matching data pair set was incomplete, that is, zero was reported for either case completions or hours, the set was rejected and not included in the pooled data for calculation of averages. A dash in the average column indicates that an average could not be determined. We believe that this is a more realistic way of presenting the data than to arbitrarily designate the midpoint of the range estimates as the average.

The data are presented in table form in Enclosure 1 and Enclosure 2. Enclosure 1 gives average staff review time of professionals only. Enclosure 2 gives average staff review time of professionals and licensing assistants in the fee categories for which licensing assistants charged time. It is our opinion that licensing assistant and professional review time should both be included. The licensing assistants are doing professional work and are actually performing reviews for some of the less complex cases. These reviews would have been performed by professionals if the licensing assistants were not available to do these cases.

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We recognize that there are some apparent inconsistencies for the staff review times within some fee categories and between some fee categories. Even with these inconsistencies, the averages, based on actual data, are probably better for most types of reviews than the estimates that were provided previously for FY77. Because we are now presenting averages based on actual data we have chosen not to include the low and high estimates for each type of review.

- 2 -

E.

We have not responded specifically to each item listed in the February 10, 1982 memorandum from Mr. Donoghue to Mr. Davis because many of the relationships both within fee categories and between fee categories have changed with the inclusion of FY80 data and with the more rigorous rejection of incomplete matching data pair sets. With regard to item 6, the computer data does not differentiate between (1) safety and environmental and (2) administrative amendments for Category 4.8.

Original signed by

Ralph M. Wilde, Program Assistant Division of Fuel Cycle and Material Safety

Enclosures:

- 1. Professional time
- 2. Professional & Licensing
 - Assistants time

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			R LICENSE FEES	FE GUARDS		
PRESENT FEE CATEGORIES 3. BYPRODUCT MATERIAL - CON'T I. Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licens- ing requirements of Part 30 of this chapter.	PROFES New License Renewal Amendment	SSIONAL & LICENSING A SAFETY REV STAFF HOU Low High	SSISTANT PROCESSI	ING TIME	FY80 & FY81 I	PPSAS DATA STAFF HOURS
J. Licenses issued pursuant to 1 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium '147 to persons exempt from the licensing require- ments of Part 30 of this chapter.	New License Renewal Amendment					
K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research	New License Renewal Amendment		19.1 16.2 2.6		53 86 · 480 ·	1011.5 1391.0 1267.9

WIFTLE UF NULLEAK MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

	PROFESS	TONAL & LICE	ENSING A	SSISTANT PROCESSING TIME	FY80 & FY81	PPSAS DATA
SENT FEE CATEGORIES			TY REVI			• •
BYPRODUCT MATERIAL - CON'T	:	Low	High	Average	CASES	. STAFF HOUSE
L. All other specific · byproduct material ·	' New License			3.4		STAFF HOURS
licenses, except those in Categories 4A through	Renewa 1			5.3	926	3123.7
10B.	Amendment			1 동생은 것은 것을 가지 않는 것	607	3196.1
WASTE DISPOSAL				1.8	2049	3746.1

B. Waste disposal licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.

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C. Waste disposal licenses specifically authorizing the receipt of prepackaged waste byproduct material, source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or

dispose of the material.

Renewal

New License

Amendment

New License.

Renewa 1

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Amendment

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INFORMATION FOR LICENSE FEES

		PRO	FESSIONAL & L	ICENSING A	SSISTANT PROCESSING T	IME	FY80 & FY81	ATAN 24299
PR	PRESENT FEE CATEGORIES		S	AFETY REVI	EW	T		
7.	HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL	1	Low	High	Average		CASES	STAFF HOURS
	B. Licenses issued pursuant to Parts 30, 40, and 70	New License						
of this chapter to medical institutions, or two or more physicians on	Renewa 1			9.6		455		
	a single license, for	Amendment ·			3.9			4366.7
	human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.						2078	8077.8
	C. Licenses issued pursuant to Parts 30, 40, and 70	New License			0.8		24	10.0
	of this chapter to an individual physician for	Renewa 1			10.2			19.8
	human use of byproduct	Amendment			1.6		16	163.7
	material, source material, or special nuclear material, except licenses in Category 7A.				1.5		162	258.5
	CIVIL DEFENSE							
	A. Licenses for possession and use of byproduct	New License			11.6			•
	material, source material, or special nuclear	Renewa1					3	35.0
	material for civil defense activities.	Amendment			1.8		36	63.0

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INFORMATION FOR LICENSE FEES

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		PRO	FESSIONAL &	LICENSING	ASSISTANT PROCESSING TIME	FY80 & FY81	ATAD 2429
<u>P</u>	PRESENT FEE CATEGORIES		SAFETY REVIEW STAFF HOURS				THE BAIN
5.	AND TRACER STUDIES	;	Low	High	Average	CASES	STAFF HOUSE
	A. Licenses for possession , and use of specific nuclear	New License			0.2	GHOLD	STAFF HOURS
	material and/or hyproduct material for well logging	Renewa1			28.1	47	292.0
	well surveys, and tracer studies.	Amendment			4.8	13	365.2
6.	NUCLEAR LAUNDRIES					98	465.7
	A. Licenses for commercial collection and laundry of	New License					
	byproduct material	Renewa1					
	source material, or special nuclear material.	Amendment					
7.	HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL						
•	A. Licenses issued pursuant to Parts 30, 40, and 70	New License					
•	use of byproduct material	Renewal					
	nuclear material in sealed	Amendment				· · · ·	
	teletherapy devices.					s	

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INFORMATION FOR LICENSE FEES

Average

PRESENT FEE CATEGORIES

9. DEVICE, PRODUCT, OR SEALED SOURCE SAFETY EVALUATION

A. Safety evaluation of devices or products containing byproduct material, source material, or special nuclear material, except reactor fuel devices and devices or products distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.

8. Safety evaluation of sealed ources containing byproduct material, source material, or special nuclear material except reactor fuel and sealed sources distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.

Fee categories 9A & 9B

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PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME SAFETY REVIEW STAFF HOURS High LOW

FY80 & FY81 PPSAS DATA

CASES

STAFF HOURS

Evaluation

Evaluation

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PRESENT FEE CATEGORIES

10. POWER SOURCE

A. Licenses for the manufac-ture and distribution of encapsulated byproduct material or special nuclear material for use in power generation, except reactor fuel.

New License Kenewa 1

Amendment

SAFETY REVIEW Low High

Average

CASES

FY80 & FY81 PPSAS DATA

STAFF HOURS

INFORMATION FOR LICENSE FEES

		PROFESSIONAL PROCESSING TIME			FY80 & FY81 PPSAS DATA	
PRESENT FEE CATEGORIES		SAFETY REVIEW STAFF HOURS				TISAS DATA
 SPECIAL NUCLEAR MATERIAL Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems. All other special nuclear material licenses, except 	New License Renewal Amendments New License		<u>igh Av</u> 1 1	erage 1.3 1.5 1.5	<u>CASES</u> 3 65 74	<u>STAFF HOURS</u> 13.0 82.0 37.5
licenses authorizing special nuclear material in unsealed form in combination that would constitute a critical guantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category 1A and special nuclear material for use in power genera- tion which shall pay the fee in Category 10.	Renewal Amendments			.5 .0	5 2 6	2.5 1.0 12.0
SOURCE MATERIAL D. All other source material licenses (Does not include milling, in-situ leaching heap leaching, refining uranium mill concentrates to UF ₆ ore buying stations and ion exchange facilities.)	New License Renewal Amendments 1.		14. 6. 3.1	2	10 47 121	' 140.0 291.7 × 464.8
1/ Professional Staff Hours						

1/ Professional Staff Hours

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INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

SAFETY REVIEW

FY80 & FY81 PPSAS DATA

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PRES	ENT FEE CATEGORIES			STAFF HOUF	3			
3.	BYPRODUCT MATERIAL		Low	High	Average	CASES	STAFF HOL	URS
	A. License for possession and use of byproduct	New License			0.8	38	31.5	
	material issued pursuant to Parts 30 and 33 of	Renewa 1			3.7	48	178.0	v
	this chapter for process- ing or manufacturing of items containing byprod- uct material for commer- cial distribution.	Amendment			0.5	173	91.5	
1	 Licenses issued pursuant to §§ 32.77, 32.73 and 	New License			24.4	12	292.7	
	32.74 of this chapter authorizing the process-	Renewa 1			16.4	10	164.0	
	ing or manufacturing and distribution of radio- pharmaceuticals, generators or reagents kits, and sources and devices, containing byproduct material.	Amendment			3.9	117	452.0	
(. Licenses for byproduct material issued pursuant	New License			19.3	11	212.5	
	to Part 34 of this chapter for industrial	Renewa1			13.2	51	, 674.8	1
	radiography operations at one location.	Amendment			2.4	109	262.9	
(Licenses for byproduct material issued pursuant 	New License			8.9	19	170.0	
	to Part 34 of this chapter for industrial	Renewa1			30.3	49	1483.5	V
•	radiography operations at more than one location.	Amendment			7.5	101	761.2	

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

SAFETY REVIEW

	FY80	å	FY81	PPSAS	DATA
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 BYPRODUCT MATERIAL - CON'T
 E. Licenses for possession, and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (selfshielded units).
 F. Licenses for possession
 New License

- and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.
- G. Licenses issued pursuant to Subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items which have been manufactured or imported under a specific license and licensed by the Commission .

New License	Low	High	Average	CASES	STAFF HOURS
			4.1	17	70.0
Renewa1			3.0	47	139.5
Amendment			2.0	63	126.0
New License			20.2	4	
Renewa1			13.5		80.9
Amendment			2.7	23	311.0
				45	120.1
New License			8.6	일 같은 이 같은 것도	
Renewa 1			10.3	7	60.0
Amendment				11	. 113.5 /
			6.3	29	182.0
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PRESENT FEE CATEGORIES

	VITAU			AL SAFETY AND SAFEGUARDS R LICENSE FEES		LICIUSURE 1
PRESENT FEE CATEGORIES			AFETY REVI	ROCESSING TIME	FY80 & FY81	PPSAS DATA
 BYPRODUCT MATERIAL - CON'T G. for distribution to persons generally licensed under Parts 31 or 35 of this chapter. 	;	Low	STAFF HOUR	Average	CASES	STAFF HOURS
 H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufac- tured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials. 	New License Renewal Amendment			10.0 3.6 2.1	10 24 56	100.1 87.5 115.0
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INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

SAFETY REVIEW

FY80 & FY81 PPSAS DATA

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PRESENT FEE CATEGORIES		SAFETY REVIEW		• •
 BYPRODUCT MATERIAL - CON'T Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licens- ing requirements of Part 30 of this chapter. 	i New License Renewal Amendment	Low High <u>Average</u> 8.7 4.9 0.3	<u>CASES</u> 3 12 6	STAFF HOURS 26.0 58.5 2.0
 J. Licenses issued pursuant to 1 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium 147 to persons exempt from the licensing require- ments of Part 30 of this chapter. 	New License Renewal Amendment	4.4 5.6 0.9	8 5 23	35.0 28.0 21.0
K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research	New License Renewal Amendment	18.4 15.8 2.6 	53 86 480	977.5 1359.5 1237.9

Enclosure 1

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

SAFETY REVIEW

FY80 & FY81 PPSAS DATA

P	RESENT FEE CATEGORIES			FF HOURS		
3.	BYPRODUCT MATERIAL - CON'T		Low	ligh Average	CASES	STAFF HOURS
	L. All other specific byproduct material	New License		2.9	926	2671.0
	licenses, except those in Categories 4A through	Renewal		4.6	607	2709.5
	108.	Amendment		1.5	2049	3082.4
4.	WASTE DISPOSAL					
	B. Waste disposal licenses specifically authorizing	New License		23.5	3	70.5
	the receipt of waste byproduct material,	Renewa1		10.0	1	10.0
	source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person author- ized to receive or dispose of the material.	Amen dmen t		4.0	11	44.0
	C. Waste disposal licenses specifically authorizing	New License			0	0
	the receipt of prepackaged waste byproduct material,	Renewa 1			0	' 0
	source material, or special nuclear material from other	Amendment			0	0
	persons. The licensee will dispose of the material by transfer to another person	L				

authorized to receive or

dispose of the material.

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Enclosure 1

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INFORMATION FOR LICENSE FEES

			PROFE	ESSIONAL PI	ROCESSING TIME	FY80 & FY81	ATAD 24299
<u>P</u>	RESENT FEE CATEGORIES		5	SAFETY REVI	IEW G		
5.	WELL LOGGING AND WELL SURVEYS AND TRACER STUDIES		Low	High	Average	CASES	
	A. Licenses for possession and use of specific nuclear	New License			6.2 .	47	STAFF HOURS
	material and/or byproduct material for well logging, well surveys, and tracer	Renewal Amendment			23.8	13	291.0 309.2 ✓
6.	studies. NUCLEAR LAUNDRIES	runch anen C			4.0	98	395.7
	A. Licenses for commercial collection and laundry of items contaminated with	New License Renewal				×	ð
	byproduct material, source material, or special nuclear material.	Amendment			2.0 0.5	1	2.0
7.	HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL						1.5
	A. Licenses issued pursuant to Parts 30, 40, and 70	New License			6.8	37	. 252.4
	of this chapter for human use of byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.	Renewa] Amendment			4.7	151	713.6
					5.2	517	2676.7

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INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

FY80 & FY81 PPSAS DATA

SAFETY REVIEW STAFF HOURS

PRESENT FEE CATEGORIES

			STAFF HOUR	0			
RIAL, SOURCE MATERIAL, OK		Low	High	Average		CASES	STAFF HOURS
to Parts 30, 40, and 70	New License			8.2		108	364.1
of this chapter to	Renewa 1			9.5		455	4309.2
two or more physicians on a single license, for numan use of byproduct material, source material, or special nuclear material, except licenses in	Amendment			3.0		2078	6131.8 -
icenses issued pursuant	New License			0.3		24	6.5
f this chapter to an	Renewa 1			7.5			119.4 ~
human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.	Amendmer.t			0.7		162	110.0
DEFENSE							
nd use of byproduct	New License			8.0		3	24.0~
iterial, source material, special nuclear	Renewa 1			4.6		11	50.5
iterial for civil defense	Amendment			1.4		36	50.0 /
	aterial, source material, r special nuclear aterial, except licenses	RIAL, SOURCE MATERIAL, OK IAL NUCLEAR MATERIAL Licenses issued pursuant to Parts 30, 40, and 70 Of this chapter to medical institutions, or two or more physicians on isingle license, for numan use of byproduct material, source material, r special nuclear material, except licenses in ategory 7A. icenses issued pursuant o Parts 30, 40, and 70 f this chapter to an ndividual physician for uman use of byproduct aterial, source material, r special nuclear material, except licenses n Category 7A. DEFENSE icenses for possession nd use of byproduct aterial, source material, r special nuclear aterial, source material, r special nuclear aterial for civil defense Amendment	RIAL, SOURCE MATERIAL, OK IAL NUCLEAR MATERIAL Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to medical institutions, or two or more physicians on single license, for numan use of byproduct material, source material, r special nuclear material, xcept licenses in ategory 7A. icenses issued pursuant o Parts 30, 40, and 70 f this chapter to an ndividual physician for uman use of byproduct aterial, source material, r special nuclear aterial, except licenses in Category 7A. DEFENSE icenses for possession d use of byproduct aterial, source material, r Special nuclear aterial, except licenses in Category 7A. DEFENSE icenses for possession d use of byproduct taterial, source material, r special nuclear aterial, source material, r special nuclear aterial, source material, r special nuclear aterial, source material, r special nuclear aterial, source material, r special nuclear aterial for civil defense terial for civil defense	Low High NUSE OF BYPRODUCT Low High NIAL, SOURCE MATERIAL, OK New License High Licenses issued pursuant New License Renewal Licenses issued pursuant New License Renewal Definis chapter to Renewal Amendment woo or more physicians on Amendment New License r special nuclear material, New License Renewal r special nuclear material, New License Renewal ndividual physician for New License Renewal ndividual physician for Renewal Mendment aterial, source material, New License Renewal ndividual physician for Mendment Mendment uman use of byproduct Amendment Mendment aterial, source material, Renewal Mendment DEFENSE Mendment Mendment icenses for possession New License Renewal ispecial nuclear Renewal Mendment ispecial nuclear Renewal Mendment ispecial nuclear Renewal Mendment	RIAL, SOURCE MATERIAL, OK IAL NUCLEAR MATERIAL Licenses issued pursuant New License Licenses issued pursuant New License Soft fis chapter to Renewal nedical institutions, or Renewal two or more physicians on Amendment isingle license, for a.c numan use of byproduct aterial, source material, ategory 7A. nuclear material, icenses issued pursuant New License 0.3 o Parts 30, 40, and 70 Renewal 7.5 individual physician for Mendmer.t 0.7 uman use of byproduct Amendmer.t 0.7 aterial, except licenses 8.0 n Category 7A. 8.0 DEFENSE 8.0 icenses for possession New License 8.0 id use of byproduct 4.6 . iterial, source material, rene	LOW High Average RIAL, SOURCE MATERIAL, OK Ide Migh Average RIAL, SOURCE MATERIAL New License 8.2 Licenses issued pursuant New License 8.2 to Parts 30, 40, and 70 Renewal 9.5 redical institutions, or Amendment 3.6 woo or more physicians on isingle license, for Amendment 3.6 ruman use of byproduct atterial, source material, respecial nuclear material, scept licenses in atterial, source material, r special nuclear New License 0.3 Mischapter to an fit is chapter to an no fatterial, source material, r special nuclear New License 0.3 DEFENSE Renewal 7.5 Icenses for possession no Category 7A. New License 8.0 DEFENSE Renewal 4.6 Icenses for possession no category 7A. New License 8.0 Defense iterial, source material, r special nuclear Renewal 4.6	NUSE OF BYPRODUCT NIAL, SOURCE MATERIAL Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to medical institutions, or wo or more physicians on isingle license, for tuman use of byproduct Material, source material, r special nuclear material, r special nuclear material, source material, r special nuclear therial for civil defenseNew License Renewal 4.6 4.6Special nuclear 4.6CASES Material A.6LowNew License Hould Hould8.03

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PROFESSIONAL PROCESSING TIME FYED & FYED & FYED PSAS DATA 9. DEVICE, PRODUCT, OR SEALED S. A. Safety evaluation of devices or products material, source material, source material is source material source ma			INFC	DRMATION FO	AL SAFETY AND SAFEGUARDS R LICENSE FEES		LICIOSURE]
 Low High Average CASES STAFF HOURS SOURCE SAFETY EVALUATION A. Safety evaluation of devices or products containing byproduct material, source material, or special nuclear material, except rom the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter. B. Safety evaluation of sealed sources containing even to Parts and the sealed sources of the sealed sealed sources of the sealed sources of the sealed sealed sources of the sealed sources of the sealed sealed			PROF	ESSIONAL PL	ROCESSING TIME	FY80 & FY81	PPSAS DATA
 Section Sources containing byproduct material, source material, source Evaluation nuclear material except reactor fuel and sealed sources distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter. Fee categories 9A & 9B 	A. Safety evaluation of devices or products containing byproduct material, source material, or special nuclear material, except reactor fuel devices and devices or products distributed to general licensees or persons exempt from the require- ments for a license pursuant to Parte 20 to	, Evaluation	Low	High	Average	CASES	STAFF HOURS
Fee categories 9A & 9B	byproduct material, source material, or special nuciear material except reactor fuel and sealed sources distributed to general licensees or persons exempt from the requirements for a license	Evaluation					
19.5							
100 1952.0		r			19.5	100	1952.0

	<u>OFF1</u>	ICE OF NUCLEAR	R MATERI	L SAFETY AND SAFEGUARDS			Enclosure 1
				LICENSE FEES			
		PROFESS	SIONAL PR	OCESSING TIME		FYRO & EVOL	DDC 40
PRESENT FEE CATEGORIES		SAF	ETY REVI AFF HOUR	EW		FY80 & FY81	PPSAS DATA
10. POWER SOURCE	:	Low	High	Average		CASES	STAFF HOUSE
A. Licenses for the manufac- ture and distribution of encapsulated byproduct	New License Renewal			1.0		4	STAFF HOURS
material or special nuclear material for use in power generation, except reactor fuel.	Amendment					0	4.0 0
				1.0	1	7	7.0

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INFORMATION FOR LICENSE FEES

	PROF	ESSIONAL & L	ICENSING AS	SSISTANT PROCESSING TIME	FY80 & FY81	PPSAS DATA
PRESENT FEE CATEGORIES			AFETY REVI STAFF HOUR			
1. SPECIAL NUCLEAR MATERIAL	1	Low	High	Average	CASES	STAFF HOURS
 Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems. 	New License Renewal Amendments					
J. All other special nuclear material licenses, except licenses authorizing special nuclear material in unsealed form in combination that would constitute a critical guantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category 1A and special nuclear material for use in power genera- tion which shall pay the fee in Category 10.	New License Renewal Amendments					
2. SOURCE MATERIAL		•			슬랐다. 양한 가방감은	
D. All other source material licenses (Does not include milling, in-situ leaching heap leaching, refining uranium mill concentrates to UF ₆ ore buying stations and ion exchange facilities.	New License Renewal Amendments			19.8 7.4 4.3	10 47 121	198.0 346.2 518.8

1/ Professional Staff Hours

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INFORMATION FOR LICENSE FEES

	PROFESS	IONAL & LICENSING A	FY80 & FY81 PPSAS DATA		
PRESENT FEE CATEGORIES		SAFETY RE STAFF HO			
3. BYPRODUCT MATERIAL	+	Low High	Average	CASES	STAFF HOULS
A. License for possession and use of byproduct	New License		1.5	38	56.0
material issued pursuant to Parts 30 and 33 of	Renewa1		4.3	48	204.5
this chapter for process- ing or manufacturing of items containing byprod- uct material for commer- cial distribution.	Amendment		0.8	173	139.5
B. Licenses issued pursuant	New License				
to \$\$ 32.77, 32.73 and 32.74 of this chapter	Renewa 1				
authorizing the process- ind or manufacturing and distribution of radio- pharmaceuticals, generato or reagents kits, and sources and devices, containing byproduct material.	Amendment				
C. Licenses for byproduct material issued pursuant	New License		22.4	11	246.0
to Part 34 of this chapter for industrial	Renewal		14.0	51	1 715.3
radiography operations at one location.	• Amendment		2.4	109	297.9
C. Licenses for byproduct material issued pursuant	New License		10.9	19	206.5
to Part 34 of this chapte: for industrial	Renawa1		30.3	49	1517.5
radiography operations at more than one location	Amendment		7.5	101	800.7

WILLOW WILLOW PHIEKIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

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	PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME	FY80 & FY81 PPSAS DATA
RESENT FEE CATEGORIES	SAFETY REVIEW STAFF HOURS	• .•
 BYPRODUCT MATERIAL - CUN'T E. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (self- shielded units). F. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for 	Low High Average se	<u>CASES</u> <u>STAFF HOURS</u>
 Irradiation purposes. G. Licenses issued pursuant to Subpart B of Part 32 of this chapter to distrib- ute items containing by- product material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items 	e 12.6 12.6 7.2	7 88.0 11 138.0 29 209.5

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PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL

which have been manufactured or imported under a specific license and licensed by the Commission

PRESENT FEE CATEGORIES

- 3. BYPRODUCT MATERIAL CON'T
 - G. for distribution to persons generally licensed under Parts 31 or 35 of this chapter.

H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) \$\$ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) .. specific licenses which authorize distribution of timepieces, hands and dials.

INFORMATION FOR LICENSE FEES PROFESSIONAL & LICENSING ASSISTANT PROCESSING TIME FY80 & FY81 PPSAS DATA SAFETY REVIEW STAFF HOURS Low High Average CASES

STAFF HOURS

New License

Renewa 1

Amendment

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MEMORANDUM FOR: Daniel J. Donoghue, Director Office of Administration

FROM:

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John G. Davis, Director Office of Nuclear Material Safety and Safeguards

SUBJECT: PROPOSED LICENSE FEE SCHEDULE REVISION (SECY 81-615)

In response to your January 4, 1982 memo, enclosed are charts showing the allocation of FY 1982 professional direct and all other (professional support) staff years for the Material Licensing Branch (Encl. 1) and the Material Certification and Procedures Branch (Encl. 2). These resources are summarized in the Materials Licensing Decision Unit chart (Encl. 3) to indicate the total resources allocated to the Materials Licensing function in NMSS.

In response to Bill Miller's January 8, 1982 memo, Enclosure 4 shows the range of professional staff hours expended on applications for new licenses, amendments and renewals in the small materials programs. The minimum (low) and maximum (high) time figures are estimates by the licensing staff since data is not maintained on a case-by-case basis. The averages, for the most part, are based on cases completed and hours charged to specific case types during FY81. In those instances where no data were available, the midpoint between the minimum and maximum estimated time figures was arbitrarily chosen. In compliing Enclosure 4, we noted that the FY81 average staff effort for reviewing a new license application is about half of the average staff effort used in FY 1977; the FY 1981 average staff effort for reviewing a renewal application is approximately twice the average staff effort used in FY 1977; and the average staff expenditures for amendments are almost the same. Please note that there are no environmental or safeguards reviews or contractual assistance associated with the issuance of materials licenses.

Currently, amendments to sealed source and device evaluations, fee categories 9A and 9B, are fee exempt. Since reviews for these amendment requests are identiaal to other materials license amendment requests, for which fees are charged, consideration should be given to making sealed source and device amendments a fee item.

In response to your question about the review of the suitability of the fiveyear expiration limit for materials licenses, the results of that review were published in SECY 78-284. That Commission Paper recommended continuation of the five-year term.

RC FORM 318 (10-80) NRCM 0240	OFFICIAL RECORD COPY

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· Daniel J. Donoghue

In closing, I feel it is important to note that shifting from the current method of charging license fees by category of license application to a fee program based on <u>actual costs</u> would not increase the revenues to the NRC if the fees are based on up-to-date data regarding the average time required to review a given category of application. Such an actual cost fee program would, however, significantly increase the administrative burden on NMSS, since we would have to keep track of staff time expenditures on a case-bycase basis for over 5,000 cases per year, each of which averages less than 5 hours of review time. Thus, my recommendations are to retain the current method of charging license fees by category of materials license, to cancel the exemptions for amendments of sealed sources and devices, and to update the fee schedule to reflect the data shown in Enclosure 4.

Claudia Seelig (NMSS/PSB/74072) is the NMSS contact for license fee matters. Both Claudia and Elise Heumann (NMSS/FC/74167) are prepared to assist your staff in interpreting the enclosed data.

(Signed) John G. Davis

John G. Davis, Director Office of Nuclear Material Safety and Safeguards

Enclosures: As stated

Distribution: File 2.6 C. Seelig -J. Evans E. Heumann -NMSS r/f J. Davis r/f ABentley 820005 W. O. Willin - are 2015

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1/22/82

Materials Licensing Branch

FY82

<u>Activity</u>	Professional Direct SY	All Other SY	<u>Total</u>
<pre>@ Licensing Case Reviews*</pre>	12.8	3.7	16.5
<pre>@ Licensing Assistance Section</pre>	12.1		12.1
Licensing Site Visists	1.0	0.1	1.1
Agreement States Assistance	1.0	0.1	1.1
Periodic Review of Regulations			
Development of Regulatory Guides			
Advisory Committee on the Medical Uses of Isotopes	1.3	0.1	1.4
<pre>@ Adminstrative</pre>	4.5		4.5
			the second se

* From the FY81 PPSAS, the license reviewers spent 74% of their time licensing and 26% of their time in administrative responsibilities (MD&S codes). This branch has 30.8 SY budgeted for licensing reviews, of which 13.5 SY is for the Licensing Assistance Section.(12.1 SY devoted to this branch's activities and 1.4 SY devoted to MCP branch.) This leaves 17.3 SY. 17.3 x 74% = 12.8 17.3 x 26% = 4.5

4.0

36.7

32.7

TOTALS

These items are part of the first planned accomplishment shown in Enclosure 3.

1/22/82

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Material	Certif	ication	and	Procedures	Branch	1
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FY82

N

	<u>Activity</u>	Professional Direct SY	All Other SY	Total
0	Licensing Case Reviews*	2.6	0.8	3.4
0	Licensing Assistance Section	1.4		1.4
	Licensing Site Visists			
	Agreement States Assistance			
	Periodic Review of Regulations	1.0	0.5	1.5
	Development of Regulatory Guides	1.2	0.7	1.9
	Advisory Committee on the Medical Uses of Isotopes			
0	Adminstrative Responsibilities*	0.9		0.9
	TOTALS	7.1	2.0	9.1

* From the FY81 PPSAS, this branch charged a total of 17,571 hours, of which 4,664.5 hours were in administrative responsibilities (MD&S codes), (26.5%). This branch has 3.5 SY budgeted for licensing reviews. 3.5 x 73.5% = 2.6 SY 3.5 x 26.5% = 0.9 SY

@ These items are part of the first planned accomplishment shown in Enclosure 3.

Materials Licensing Decision Unit

FY82

FY82 Operating Plan Planned Accomplishment	Professional Direct SY	All Other SY	Total
Licensing Case Reviews*	34.3	4.5	38.8
Licensing Site Visists	1.0	0.1	1.1
Agreement States Assistance	1.0	0.1	1.1
Periodic Review of Regulations	1.0	0.5	1.5
Development of Regulatory Guides	1.2	0.7	1.9
Advisory Committee on the Medical Uses of Isotopes	1.3	0.1	1.4
			1-
TOTALS	39.8	6.0	45.8

*This planned accomplishment in the NMSS FY82 Operating Plan includes three activities as shown on Enclosures 1 and 2. Those are (1) the actual review of license applications by the professional staff, (2) licensing support by the Licensing Assistance Section, and (3) administrative actions (e.g. FOIA's) performed by the professional staff. Those items are identified by an "@" on Enclosures 1 and 2.

			OFFICE OF NUCL	EAR MATERIA	L SAFETY AND SAFEGUARD	s		
•					LICENSE FEES	•		
			PROF	ESSIONAL PRO	DCESSING TIME	PROJECTED FY 82 RES	OURCE COMMITMEN	<u>IT</u>
PRE	ESENT FEE CATEGORIES			SAFETY REVI	EW			
1.	SPECIAL NUCLEAR MATERIAL		Low	High	Average	CASES	STAFF HOURS	
	I. Licenses for possession and use of special nuclear	New License	0.5	8.0	4.0	0	0	
	material in sealed sources contained in devices used	Renewa1	0.5	8.0	1.0	9	9.0	·.)
	in industrial measuring systems.	Amendments	0.5	8.0	1.0	35	35.0	
	J. All other special nuclear material licenses, except	New License	0.5	24.0	1.0	3	3.0	
	licenses authorizing special nuclear material	Renewa1	0.5	24.0	12.0	6	72.0	
	in unsealed form in combination that would constitute a critical quantity as defined in § 150.11 of Part 150 which shall pay the same	Amendments	0.5	24.0	12.0	0	0	
	rate as Category 1A and special nuclear material for use in power genera- tion which shall pay the fee in Category 10.							2
2.	SOURCE MATERIAL					Contraction and the second		- 5
	D. All other source material licenses (Does not include	New License	0.5	40.0	29.7	5	148.5	Enclosur- 1/22/82
	milling, in-situ leaching heap leaching, refining	Renewa 1	0.5	40.0	9.8	19	186.2	82
	uranium mill concentrates to UF6 ore buying stations and ion exchange facilities	Amendments	0.5	40.0	3.5	64	224.0	4

1/ Professional Staff Hours

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

				PRO	FESSIONAL PI	PROFESSIONAL PROCESSING TIME	PROJECTED FY 82 RESOURCE COMMITMENT	OURCE COMMITMENT
PRESENT FFF CATEGORIES	CORTES				SAFE TY REVIEW STAFF HOURS	ai .		
3. BYPRODUCT MATERIAL	TERIAL '			LOW	High	Average	CASES	STAFF HOURS
A. Licenses	Licenses for possession	New License		2.0	40.0	4.8	21	100.8
material to Parts	material issued pursuant to Parts 30 and 33 of	Renewa!		2.0	40.0	3.6	31	- 111.6
this chai	this chapter for process- ing or manufacturing of	Amendment	•	0.5	40.0	1.3	125	162.5
items con uct mater cial dist	items containing byprod- uct material for commer- cial distribution.							
B. Licenses to 66 32.	Licenses issued pursuant to 46 32.72. 32.73 and	New License		20.0	48.0	31.7	9	190.2
32.74 of	32.74 of this chapter	Renewal		8.0	30.0	13.0	10	130.0
ing or me	ing or manufacturing and	Amendment		0.5	30.0	2.9	88	232.0
C or reager	pharmaceuticals, generators or reagents kits, and sources and devices,	5						
containin material.	containing byproduct material.							
C. Licenses	Licenses for byproduct material issued pursuant	New License		3.0	32.0	24.2	5	121.0
to Part	to Part 34 of this	Renewal		3.0	32.0	14.7	39	573.3
radiography oper at one location.	radiography operations at one location.	Amendment		0.5	32.0	2.6	74	192.4
D. Licenses	Licenses for byproduct	New License	•	4.0	40.0	11.0	. 12	231.0
to Part 3	to Part 34 of this chapter for industrial	Renewal		4.0	40.0	19.9	51	1014.9
adiogra	radiography operations at more than one location.	Amendment		0.5	40.0	4.1	118	483.8

INFORMATION FOR LICENSE FEES

			PRO	FESSIONAL P	ROCESSING TIME	PROJECTED FY 8	2 RESOURCE COMMITMENT
RESENT FEE CATEGORIES	1,			SAFETY REVI	EW		
1. BYPRODUCT MATERIAL - CON'T	, i ,		Low	High	Average	· CASES	STAFF HOURS
Licenses for possession and use of byproduct	New License		1.0	8.0	4.6	8	
material in sealed sources for irradiation	Renewa 1		1.0	8.0	1.8		36.8
of materials where the source is not removed	Amendment		0.5	8.0	1.1	29	52.2
from its shield (self- shielded units).						33	36.3
F. Licenses for possession and use of byproduct	New License		4.0	40.0	36.2		
material in sealed sources for irradiation	Renewa1		4.0	32.0	7.4	2	72.4
of materials where the source is exposed for	Amendment		0.5			13	96.2
irradiation purposes.			0.5	32.0	2.1	26	54.f
C. Licenses issued pursuant to Subpart B of Part 32 of	New License	*	2.0	24.0	16.7	3	
this chapter to distrib- ute items containing by-	Renewa1		2.0	24.0	7.9		·50.1
product material or quantities of byproduct	Amendment		0.5	24.0	7.3	10	79.0
material to persons					1.5	17	124.1
generally licensed under Parts 31 and 35 of this							
chapter, except specific licenses authorizing							
redistribution of items which have been manufac-							
. tured or imported under a							
specific license and licensed by the Commission	NO GARAGE						
sine commission							

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

SAFETY REVIEW

ACOCHI	TEE CATEGORIES							
3. BY	PRODUCT MATERIAL - C'IN'T	•	Low	High	Average		CASES	STAFF HOURS
(¢	for distribution to persons generally licensed under Parts 31 or 35 of this chapter.							
н.	Licenses issued pursuant to Subpart A of Part 32 of	New License	2.0	24.0	6.3	•	6	37.8
	this chapter to distribute items containing byproduct	Renewa1	2.0	24.0	5.2		12	62.4
	material or quantities of byproduct material to	Amendment	0.5	24.0	2.1		30	63.0
	persons exempt from the licensing requirements of Part 30 of this chapter,					•		
0	except (1) 55 32.11 and 32.18 of this chapter, (2) specific licenses							
c.	authorizing redistribution							

except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials.

PRESENT FEE CATEGORIES

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

RESE	NT FEE CATEGORIES			SAFETY REVI	EW		
3. B	YPRODUCT MATERIAL - CON'T	, 4, 1. ¹	Low	High	Average	' CASES	STAFF HOUDE
0	Licenses issued pursuant to § 32.18 of this	New License	2.0	32.0	25.3	1	STAFF HOURS
	chapter to distribute quantities of byproduct	Renewa 1	· 2.0	24.0	3.3	9	25.3
	material to persons exempt from the licens- ing requirements of Part 30 of this chapter.	Amendment	0.5	24.0	12.0	4	29.7 48.0
J.		New L1cense	2.0	24.0			
	chapter to distribute timepieces, hands and	Renewa 1	2.0	24.0	8.1 9.0	2	16.2
	dials, containing hydrogen 3 or promethium 147 to persons exempt	Amendment	0.5	24.0	0.8	2	18.0 8.8
0	from the licensing require- ments of Part 30 of this chapter.		•				0.0
к.	and use of byproduct	New License	0.5	40.0	13.1	36	471.6
	material for research and development, except those	Renewa 1	0.5	40.0	12.1	43	
	licenses covered by Categories 3A or 3B, and licenses covered by	Amendment	0.5	40.0	1.9	283	520.3 537.7
	Categories 7B or 7C authorizing medical research.	1 I					

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME PROJECTED FY 82 RESOURCE COMMITMENT

RESENT FEE CATEGORIES	1		SAFETY REVIE STAFF HOURS			
3. BYPRODUCT MATERIAL - CON'T		Low	High	Average	CASES	STAFF HOURS
C. All other specific byproduct material	New License	0.5	40.0	4.6	449	2065.4
licenses, except those in Categories 4A through	Renewa 1	0.5	40.0	6.6	240	1584.0
108.	Amendment	0.5	24.0	2.5	957	2392.5
1. WASTE DISPOSAL						
B. Waste disposal licenses specifically authorizing	New License	2.0	40.0	19.0	0	0
the receipt of waste byproduct material,	Renewa1	2.0	40.0	19.0	0	0
source material, or special nuclear material from other persons for the purpose of packaging	Amendment	0.5	40.0	20.0	0	0
the material. The licensee will dispose of the material by transfer to another person author- ized to receive or dispose of the material.			•			
C. Waste disposal licenses specifically authorizing	New License	2.0	40.0	24.3	. 2	48.6
the receipt of prepackaged waste byproduct material,	Renewal L	2.0	40.0	10.0	1	10.0
source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or	Amendment	0.5	40.0	0.8	5	4.0

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES	1		SAFETY REVI	EW		
5. WELL LOGGING AND WELL SURVE AND TRACER STUDIES	YS , '	Low	High	Average	CASES	STAFF HOURS
A. Licenses for possession and use of specific nuc	lear	2.0	32.0	6.4	31	198.4
material and/or byprodu material for well loggi	00.	2.0	32.0	26.6	8	212.8
well surveys, and trace studies.	r Amendment	0.5	32.0	4.1	62	254.2
6. NUCLEAR LAUNDRIES						234.2
A. Licenses for commercial collection and laundry	of	4.0	32.0	18.0		
items contaminated with byproduct material,	Renewa1	4.0	32.0	2.0	그는 가는 것은 것이 같은	18.0
source material, or spec nuclear material.	ial Amendment	0.5	32.0	1.0	3	2.0 3.0
7. HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, C SPECIAL NUCLEAR MATERIAL	R					
A. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter for huma		4.0	40.0	6.6	24	100.4
 use of byproduct materia 	1.	2.0	40.0	5.6	. 81	158.4
source material, or spec nuclear material in seal sources contained in teletherapy devices.	1al Amendment ed i.	0.5	40.0	4.3	324	453.6 1393.2

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

ESENT FEE CATEGORIES		1	SAFETY REVIEN	<u>N</u>		
HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR CPECIAL NUCLEAR MATERIAL	•	Low	High	Average	CASES	STAFF HOURS
B. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to	New License Renewal	4.0	24.0	11.2	36	403.2
medical institutions, or two or more physicians on		2.0	24.0	11.3	199	2248.7
a single license, for human use of byproduct material, source material	Amendment	0.5	24.0	3.5	1265	4427.5
or special nuclear material except lice . in Category /A.	•					
C. Licenses issued pursuant to Parts 30, 40, and 70	New License	4.0	24.0	6.0	. 29	174.0
of this chapter to an individual physician for	Renewal	2.0	24.0	9.6	김 이는 것은 친구가 물건하는 것	
numan use of byproduct material, source material, or special nuclear	Amendment	0.5	24.0	2.2	95	163.2 209.0
material, except licenses in Category 7A.						
CIVIL DEFENSE						
and use of pyproduct	New License	1.0	16.0	8.6		
matorial courses it is	Renewa 1	1.0			. 2	17.2
, material for civil defense	Amendment	1.0	16.0	4.3	8	34.4
activities.	in the second seco	0.5	16.0	1.9	18	34.2

INFORMATION FOR LICENSE FEES

SAFETY REVIEW

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

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	THESENT TEE CHILGONIES			STAFF HOUR	5		
	9. DEVICE, PRODUCT, OR SEALED SOURCE SAFETY EVALUATION	• •	Low	High	Average	CASES	STAFF HOURS
	A. Safety evaluation of devices or products containing byproduct material, source material, or special nuclear material, except reactor fuel devices and devices or products distributed to general licensees or persons exempt from the require- ments for a license	Evaluation	8.0	80.0	19.5		<u>STREE HOOKS</u>
	pursuant to Parts 30, 40, and 70 of this chapter.		•				
	C8. Safety evaluation of sealed sources containing						
	byproduct material, source material, or special nuclear material except reactor fuel and sealed sources distributed to	Evaluation	8.0	80.0	19.5		
	general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.						
	Fee categories 9A & 9B	·					
1					19.5	100	1952.0

OTTICE OF NUCLEAR MATERIAL	SHIFFILL	AND	SAFEGUARDS

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INFORMATION FOR LICENSE FEES

			PRO	FESSIONAL P	ROCESSING TIME		
PRESENT FEE CATEGORIES SAFETY REVIEW						PROJECTED FY 82 RESOURCE COMMITMENT	
0. POWER SOURCE			STAFF HOURS				
encapsulated byproduct material or special nuclear material	•		Low	High	Average		
	New License				<u></u>	CASES	STAFF HOURS
	Renewa 1		8.0	40.0	24.0		STATT HOUKS
	Amendment		8.0 40.0 24.0	0	0		
	- mendanen c		0.5	40.0	0.6	0	0
						5	3.0



JAN 2 1 1982

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MEMORANDUM FOR: Richard E. Cunningham, Director Division of Fuel Cycle and Material Safety

FROM: R. S. Brown, Jr. Assistant to the Director and Chief, Program Support Branch, NMSS

SUBJECT: PROPOSED LICENSE FEE REVISION (NMSS 82-05)

I have reviewed your response to Dan Donoghue's memo on the above subject. There are two questions in Mr. Donoghue's memo which still require answers. He wants to know the results of the review on the suitability of the five-year expiration limit for materials licenses. He also wants a contact designated that is familiar with the materials licensing expenditures. E lise Heumann

The responses to these questions can either be provided to me and PSB will incorporate them into a memo from Mr. Davis to Mr. Donoghue; or if Fuel Cycle prefers, you can include them along with your previous response in a memo from Mr. Davis to Mr. Donoghue.

Brown, Jr.

Assistant to the Director and Chief Program Support Branch, NMSS

